

DIANA CLINE EBRON, ESQ.
Nevada Bar No. 10580
E-mail: diana@KGELegal.com
JACQUELINE A. GILBERT, ESQ.
Nevada Bar No. 10593
E-mail: jackie@KGELegal.com
KAREN L. HANKS, ESQ.
Nevada Bar No. 9578
E-mail: karen@KGELegal.com
KIM GILBERT EBRON
7625 Dean Martin Drive, Suite 110
Las Vegas, Nevada 89139
Telephone: (702) 485-3300
Facsimile: (702) 485-3301
Attorneys for SFR Investments Pool 1, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NATIONSTAR MORTGAGE LLC,

Plaintiff,

vs.

THE SPRINGS PROPERTY OWNERS
ASSOCIATION; and SFR INVESTMENTS
POOL 1, LLC,

Defendant.

SFR INVESTMENTS POOL 1, LLC, a
Nevada limited liability company,

Counter/Cross Claimant,

vs.

NATIONSTAR MORTGAGE LLC;
ALBERTO D. DACAYANAN, JR., an
individual; SAMANTHA A. DACAYANAN,
an individual,

Counter/Cross Defendants,

Case No. 2:16-cv-02013-JCM-VCF

**STIPULATION AND (Proposed) ORDER
TO EXTEND TIME TO FILE
DISPOSITIVE MOTIONS
(First Request)**

Defendant SFR INVESTMENTS POOL 1, LLC (“SFR”), Defendant THE SPRINGS
PROPERTY OWNERS ASSOCIATION (the “Association”), and Plaintiff NATIONSTAR

1 MORTGAGE LLC (“Nationstar”)¹ hereby stipulate and agree to extend the time for the parties to
2 file dispositive motions for an additional two weeks, until May 4, 2017, as outlined below. The
3 current dispositive motion deadline is April 20, 2017. This is the first request for an extension of
4 time.

5 1. This lawsuit involves the parties seeking quiet title/declaratory relief and other
6 claims related to a non-judicial homeowner's association foreclosure sale conducted on a Property
7 pursuant to NRS 116.

8 2. Pursuant to the scheduling plan and order [ECF No. 13], the dispositive motion
9 deadline is April 20, 2017.

10 3. The Association filed its motion for summary judgment on April 18, 2017 [ECF
11 No. 33.]

12 4. Undersigned counsel for SFR represented to counsel for Nationstar and the
13 Association that on April 6, 2017, one of attorneys from Kim Gilbert Ebron (“KGE”) assigned to
14 the case on behalf of SFR was involved in a debilitating automobile accident, resulting in
15 protracted absence from the firm. It is yet unclear as to when the attorney will have the capacity
16 to return to work full-time and her workload is being reassigned.

17 5. Due to the foregoing, the Parties request additional time to submit their dispositive
18 motions. This will allow SFR to either re-assign the case to a different attorney or allow for the
19 return of the attorney originally assigned. Additionally it will allow Nationstar to file
20 contemporaneously with SFR, thereby allowing these parties’ motions to come before the Court
21 at the same time for consideration of all facts and arguments.

22 6. The Parties also request that the time to respond to the Association’s motion for
23 summary judgment be extended to the same date as the time as responses to Nationstar’s and SFR’s
24 motions will be due. This will also place all motions before the Court contemporaneously for
25 consideration of any facts and issues that may be relevant to Nationstar’s and SFR’s motions.

26 7. The parties hereby respectfully request that the deadline for dispositive motions be

27 _____
28 ¹ SFR dismissed Cross-Defendants Alberto D. Dacayanan, Jr. and Samantha A. Dacayanan by
stipulation and Order entered on April 13, 2017 [ECF No. 32].

1 extended to May 4, 2017 due to this unforeseeable accident and that the time to respond to the
2 Association's motion for summary judgment [ECF No. 33] be extended to be contemporaneous
3 with the responses to Nationstar's and SFR's motions.

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8. This is the first request for extension of the dispositive motion deadline and the request is not meant for purposes of delay or prejudice but to allow SFR to re-assign and fully brief its dispositive motion and allow the Court to consider all motions contemporaneously.

Dated this 19th day of April, 2017.

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| <p>KIM GILBERT EBRON</p> <p><u>/s/Jacqueline A. Gilbert</u> DIANA CLINE EBRON, ESQ. Nevada Bar No. 10580 JACQUELINE A. GILBERT, ESQ. Nevada Bar No. 10593 KAREN L. HANKS, ESQ. Nevada Bar No. 9578 7625 Dean Martin Drive, Suite 110 Las Vegas, NV 89139 Phone: 702-485-3300</p> <p><i>Attorneys for SFR Investments Pool 1, LLC</i></p> | <p>AKERMAN LLP</p> <p><u>/s/Rex Garner</u> MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 REX GARNER, ESQ. Nevada Bar No. 12488 1160 Town Center Drive, Suite 330 Las Vegas, Nevada 89144 Phone: 702-634-5000</p> <p><i>Attorneys for Nationstar Mortgage LLC</i></p> |
| <p>BOYACK ORME & TAYLOR</p> <p><u>/s/ Colli C. McKiever</u> EDWARD D. BOYACK, ESQ. Nevada Bar No. 005229 Colli C. McKiever, Esq. Nevada Bar No. 13724 401 N. Buffalo Drive, Suite 202 Las Vegas, Nevada 89145</p> <p><i>Attorneys for Springs Property Owners Association</i></p> | |

ORDER

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: May 2, 2017